

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

IN RE: Michael J. Rankin,
Linda J. Rankin,
Debtors,

Michael Rankin, and
Linda Rankin,
Plaintiffs,

v.

Grandview Plaza I, LLC and
Bruck Law Offices, S.C.,
Defendants

**NOTICE OF MOTION AND MOTION
TO EXTEND TIME TO FILE ANSWER**

TO: Michael G. Mack, Esq.
Michael G. Mack Law Offices
10855 West Potter Road, Suite 14
Milwaukee, WI 53226

PLEASE TAKE NOTICE that Grandview Plaza I, LLC and Bruck Law Offices, S.C., jointly, move the above-named Court, United States Bankruptcy Court for the Eastern District of Wisconsin, U.S. Courthouse, 517 E. Wisconsin Avenue, Milwaukee, WI 53202, before the Honorable Susan V. Kelley, for an Order Extending the Time to File Answer. The grounds for said Motion are set forth in the Memorandum which is attached hereto and incorporated herein by reference.

Dated at Milwaukee, Wisconsin this April 29, 2015.

BRUCK LAW OFFICES, S.C.

By: /s/ Nicholas A. Smith
Nicholas A. Smith
Attorney for Grandview Plaza I, LLC and
Bruck Law Offices, S.C.

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

IN RE:	Michael J. Rankin, Linda J. Rankin, Debtors,	Adversary No. 15-02159 Case No. 09-37264
	Michael Rankin, and Linda Rankin, Plaintiffs,	Chapter 7
v.		
	Grandview Plaza I, LLC and Bruck Law Offices, S.C., Defendants	

**MEMORANDUM IN SUPPORT OF
MOTION TO EXTEND TIME TO FILE ANSWER**

NOW COMES Grandview Plaza I, LLC and Bruck Law Offices, S.C. by BRUCK LAW OFFICES, S.C. their attorneys and states the following Motion for to Extend Time to File Answer herein.

On or about April 2, 2015, Debtor-plaintiffs Michael and Linda Rankin filed a Complaint for Declaratory Judgment that Debt is Subject to Debtors' Discharge, and for Sanctions for Violation of the Discharge Injunction. Said Complaint was subsequently served upon Defendants Grandview Plaza I, LLC and Bruck Law Offices, S.C. Pursuant to Bankruptcy Rule 7012, Grandview Plaza I, LLC and Bruck Law Offices, S.C. are required to file an answer on or before May 4, 2015. The respective counsel for plaintiffs and defendants are attempting to negotiate a settlement which would avoid further litigation and costs in this matter. As such, Grandview Plaza I, LLC and Bruck Law Offices, S.C. respectfully request the time to answer be extended and the Mary 12, 2015 pre-trial conference be adjourned to provide the parties with additional time to negotiate. Attorney Michael G. Mack, counsel for plaintiffs, has indicated he does not object to an extension of time to answer so the parties may negotiate a possible settlement of this matter.

WHEREFORE, Grandview Plaza I, LLC and Bruck Law Offices, S.C. respectfully request the Court extend the time to answer the complaint and adjourn the May 12, 2015 pre-trial conference to a later date.

Respectfully Submitted, this April 29, 2015.

BRUCK LAW OFFICES, S.C.

/s/ Nicholas A. Smith
Nicholas A. Smith
Attorney for Grandview Plaza I, LLC and
Bruck Law Offices, S.C.

ADDRESS:
Sixth Floor
322 East Michigan Street
Milwaukee, WI 53202
(414) 223-3335

UNITED STATES BANKRUPTCY COURT
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IN RE: Michael J. Rankin,
Linda J. Rankin,
Debtors,

Michael Rankin, and
Linda Rankin,
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Adversary No. 15-02159
Case No. 09-37264
Chapter 7

v.

Grandview Plaza I, LLC and
Bruck Law Offices, S.C.,
Defendants.

CERTIFICATE OF SERVICE

STATE OF WISCONSIN)
)
MILWAUKEE COUNTY) ss.
)

Nicholas A. Smith, being first duly sworn on oath, deposes and says as follows:

1. I am an Attorney at Bruck Law Offices, S.C. and a resident of the State of Wisconsin.
2. On April 29, 2015 the following persons were served with the Notice of Motion and Motion to Extend Time to Answer and Memorandum in Support of Motion to Extend Time to Answer by the ECF notice of Electronic Filing:

Michael G. Mack, Esq.

Dated at Milwaukee, Wisconsin this April 29, 2015.

BRUCK LAW OFFICES, S.C.

/s/ Nicholas A. Smith
Nicholas A. Smith
Attorney for Grandview Plaza I, LLC and
Bruck Law Offices, S.C.

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